

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT

I, **Frank Casado**, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with Immigration and Customs Enforcement (“ICE”), Homeland Security Investigations (“HSI”) San Juan, I was previously employed as a Special Agent with the U.S. Secret Service (“USSS”) from July 2021 to March 2023. Prior to my federal law enforcement career, I was employed as a Police Officer with the New York City Police Department (“NYPD”) from October 2018 to July 2021. As part of my duties as a Special Agent with HSI, I investigate various crimes of federal law some of which relate to crimes committed at the borders of the United States. During my tenure as a Law Enforcement Officer, I have participated in various narcotics investigations. As part of my law enforcement experience, I have conducted physical surveillance, execution of search and arrest warrants, and in the seizure of narcotics. My investigative experience detailed herein, as well as my training, experience of other law enforcement officers who are participating in this investigation, serve as the basis for the conclusions set forth herein. I am currently assigned to the HSI San Juan Border Enforcement Security Task Force (“BEST”).
2. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and does not set forth all of my knowledge about this matter. I make this affidavit based on my own personal knowledge and on oral and written reports by other federal, state, and/or local law enforcement agents and officers that investigated this matter. This affidavit does not contain all the information derived from this investigation only that which is sufficient to demonstrate probable cause to believe that a crime has been committed.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of **8 U.S.C. § 1326(a) – *Illegal Reentry of removed alien*** has been committed by **Pedro POCHE (“POCHE”)**.

PROBABLE CAUSE

4. On May 21, 2025, at approximately 2:10pm, POCHE was encountered and arrested without incident by Homeland Security Investigations Agents (HSI) in San Juan, Puerto Rico. POCHE was arrested along Highway PR-187, Loiza, PR 00772.
5. HSI SAs encountered POCHE during a traffic stop conducted by the Puerto Rico Police Bureau (PRPB) Highway Patrol.
6. POCHE provided his identifiers and HSI SAs performed an immigration examination on POCHE. As a result, it was determined that POCHE is a national and citizen of the Dominican Republic who was and continues to be illegally present in the United States.
7. Subsequently, HSI SAs conducted an immigration inspection on POCHE to determine his admissibility and it was determined that POCHE was not in possession of a valid unexpired immigrant visa, reentry permit, border crossing identification card, or other valid entry document, and a valid unexpired passport, or other suitable document, or document of identity and nationality to be enter, pass through, or remain in the United States. HSI SAs determined that POCHE is inadmissible to the United States, and SAs arrested and transported POCHE to HSI’s Office in San Juan, Puerto Rico, for further processing.
8. Record checks indicate that POCHE was issued a Puerto Rico driver’s license on February 3, 2022, and that POCHE is a national and citizen of the Dominican Republic (“DR”) who unlawfully entered the United States after being previously removed.
9. Further immigration records checks revealed the following:

- a. On November 13, 2018, POCHE was encountered at Luis Munoz Marin International Airport attempting to board a flight to John F. Kennedy International Airport, New York, NY while being present in the United States without legal documentation. U.S. Customs and Border Protection (CBP) Officers issued an expedited order of removal for POCHE.
 - b. On November 14, 2018, POCHE was removed from the United States through San Juan, PR to the Dominican Republic.
10. POCHE was provided with Miranda warnings in his native language at approximately 18:30 hours on May 21, 2025. POCHE waived his Miranda warnings and agreed to answer questions. POCHE stated he re-entered the United States by yawl at the beginning of 2019, around Cabo Rojo, PR.
11. Record checks also revealed that as of May 21, 2025, POCHE had not submitted an application requesting permission to enter the United States (Form I-212) before the United States Citizenship and Immigration Services (“USCIS”). Furthermore, POCHE has not obtained consent from the Secretary of Homeland Security to enter the United States, nor does he have any immigration documents allowing him to legally enter and/or remain in the United States.

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CONCLUSION

12. Based on the forgoing, and based upon my training, experience and participation in this and other investigations, I believe that sufficient probable cause exists to demonstrate that POCHÉ reentered the United States after being removed resulting in violations to **8 U.S.C. § 1326(a) – *Reentry of removed alien.***

Sworn by telephone pursuant to the requirements of Federal Rules Procedures 4.1 on this 22 day of May 2025, at 1:44 p.m.

Respectfully submitted,

**FRANK
CASADO**

Digitally signed by
FRANK CASADO
Date: 2025.05.22
13:32:18 -04'00'

Frank Casado

Special Agent

Homeland Security Investigations (HSI)



Digitally signed by
Hon. Giselle López-
Soler

Giselle López-Soler

UNITED STATES MAGISTRATE JUDGE
DISTRICT OF PUERTO RICO